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April 12, 2022

**VIA ECF**

Hon. Margo K. Brodie  
Chief United States District Judge  
United States District Court, EDNY  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Raza Sikandar  
Indictment # 20 CR 582 (MKB)

Dear Chief Judge Brodie;

I write to respectfully request that the Court direct the Metropolitan Detention Center, where Mr. Sikandar is housed, to immediately provide him with the copy of his PSR which I sent to him on March 25. As Your Honor knows, sentencing is scheduled for April 29, and we do not wish to adjourn it.

On March 25, 2022, I sent the PSR to Mr. Sikandar, properly marked the outer envelope as "Legal Mail, Open Only in the Presence of the Inmate", as BOP requires, and also enclosed a cover letter discussing procedures. My client informed me that he did not receive the mail, but after some days had passed, and he made several inquiries of his unit team, he was told that the PSR was being kept by the unit team and he could review it only in their presence. Up to that point, he did not even know it was in the building, which clearly means that the mail was opened in contravention of MDC's own regulations and in violation of Mr. Sikandar's rights to privileged material.

I contacted Sophia Papapetru at MDC legal by email, and she advised that the situation would be taken care of. In spite of that assurance, when I went to visit Mr. Sikandar last week to discuss the PSR and prepare for sentencing, he still did not have a copy, and told me that he was given only 15 minutes to review it and could not retain a copy. We did discuss it, of course, but there are still matters left to discuss next week, before the sentencing submission is finalized for submission to Your Honor.

I followed up with email to Ms. Papapetru, but as of last night, Mr. Sikandar advises that he still does not have the PSR. This situation is, frankly, unacceptable, and in my experience, unprecedented. I have always sent the PSR to clients before, clearly marked legal mail and otherwise in compliance with MDC's rules, and never had this issue arise.

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I therefore respectfully request that the Court immediately order the authorities at MDC to provide to Mr. Sikandar his PSR, and direct that he be permitted to retain it in his own legal paperwork until sentencing.

Thank you for your courtesy and consideration.

Respectfully yours,

**/s/JOHN S. WALLENSTEIN**

JOHN S. WALLENSTEIN

JSW/hs